

**REMARKS**

Claims 1-18 are pending in this application. Claims 1-18 stand rejected. In light of the remarks set forth below, Applicant respectfully submits that each of the pending claims is in immediate condition for allowance.

Claims 1-14 and 16-18 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,208,689 (“Ohira”). Applicants respectfully request reconsideration and withdrawal of this rejection.

The Office Action states that “Ohira clearly teaches such claim limitation as addressed in the above paragraph.” See Office Action at 8. The “above paragraph” refers to Ohira column 13, lines 26-32 and column 14, lines 8-28 and the discussion in the Office Action related thereto. Column 14 states that the image data is compressed in response to the compression rate obtained in column 13.

As can be seen from the components of the Ohira reference, one difference between the present invention and Ohira is the claimed memory access with controller and Ohira’s compression rate judging section 106, shown in Figure 18. The present invention utilizes the number of bits of a memory access unit, i.e., the memory bus width accessing the memory, whereas the cited Ohira reference is an operation relating to the compression rate for compressing the image data. The statement at column 13, lines 8-28 does not teach the present invention.

The Office Action argues that “the compression rate judging section 106” judges a rate of the decoded data 151 to be compressed and stored in the frame memory based upon the size of the image in connection with the storage capacity of

the frame memory” discloses the present invention. Applicants disagree with this interpretation of Ohira. Ohira states that the compression rate is decided with the storage capacity and the image size. The storage capacity is discussed at column 13, line 20. The statement “the predictive/display frame memory section 103 including claim memory, being assigned a predetermined storage capacity stores image data on a frame basis” exists therein. This means that the image data is stored in a predetermined storage capacity on a frame basis.

Applicants further disagree that the number of bits of the memory access unit is included in the concept of storage capacity. The mere mention of storage capacity for storing the image refers to, for example, the size of the data that can be written in the memory. As such, Applicants do not believe that the unit for writing the data is included therein, i.e., the memory bus accessing the memory. For example, there are various memories having the same capacity of 128 megabytes of which the data bus width (equivalent to the number of bits of a memory access unit) is 8 bits, 16 bits, 32 bits, etc. In a case where the teaching of Ohira is used, the compression data rate is not altered, even though the memory having a different data bus width is employed. On the other hand, where the claimed invention is used, when the memory having a different data bus is employed, the data compression rate is altered.

In other words, according to Applicants’ explicitly recited claim, in the present invention, not only the storage capacity and the size of the image affect the compression rate but also the number of bits of a memory access unit specific to the memory. In contrast, in the Ohira reference, a predetermined storage capacity

storage image stores image data on a frame basis. As such, the Ohira reference fails to disclose Applicants' explicitly recited claims.

Each of the claims of the present invention requires that bit allocation control occurs as a function of the number of bits in a memory access unit. The claims are distinguished from conventional compression systems in that, as the specification of the present application makes clear, conventional systems do not take the number of bits in a memory access unit into account when performing bit allocation control. Rather, conventional systems perform bit allocation control based on the compression ratio.

Ohira's system is identical in this respect to the conventional systems described in the specification of the present invention. In Ohira, as discussed above, a compression rate judging section is described as judging a rate of the decoded data to be compressed and stored in the frame memory based upon the size of the image in connection with the storage capacity of the frame memory. The compression rate judging section selects a compression mode based on this rate of compression. Nothing in Ohira suggests that the memory access unit (memory bus with accessing memory) is taken into account as explicitly recited in Applicants' claim.

Claim 15 was rejected as being obvious over the combination of Ohira and Nakajima. Nakajima was not added to cure the deficiencies discussed above but to show additional limitations which, even if it were to show, does not cure the deficiencies above. As such, claim 15 is allowable.

Applicant has responded to all of the rejections and objections recited in

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the Office Action. Reconsideration and a Notice of Allowance for all of the pending claims are therefore respectfully requested.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

If the Examiner believes an interview would be of assistance, the Examiner is welcome to contact the undersigned at the number listed below.

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Respectfully submitted,

By

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